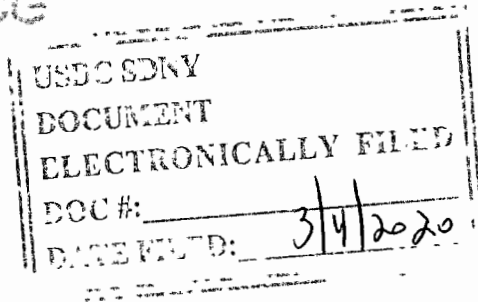


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March 3, 2020



VIA ECF

Honorable Colleen McMahon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED
OK
will there be a motion to consolidate these cases? If so, when?
3/4/2020

Re: Calderon et al. v. Clearview AI, Inc. et al., No. 1:20-cv-01296-CM

Dear Chief Judge McMahon:

We represent defendant CDW Government LLC ("CDW-G") in the above-referenced case. We write to respectfully request an extension of CDW-G's time to respond to the Class Action Complaint from March 10, 2020 to April 24, 2020. We have conferred with Plaintiffs' counsel, and Plaintiffs have consented to the requested extension, which is the same one sought by defendant Clearview AI, Inc. ("Clearview") and granted by the Court last week (see Doc. Nos. 11 and 12).

Plaintiffs filed their Class Action Complaint on February 13, 2020. CDW-G was served with the complaint on February 18, 2020, and its responsive pleading is currently due March 10, 2020. At least two other purported federal class action complaints have been filed against CDW-G and Clearview since January 22, 2020 in other federal judicial districts. Given the nature of the claims asserted, the complex facts and technical details that are implicated by this and other lawsuits, including consideration of the extent to which these proceedings may be consolidated in the interest of judicial efficiency, CDW-G respectfully requests an extension of time in which to answer, move or otherwise respond until April 24, 2020.

This is CDW-G's first request for an extension of time in this matter. As this Court has not yet issued a case management order, the extension will not affect any existing deadlines in this case. CDW-G submits this letter without waiving, and while expressly reserving, its right to contest subject matter jurisdiction in this litigation.

Respectfully submitted,

Joshua Dunn
Associate

JD/kms

cc: Lee Wolosky (via ECF)
Joshua Arisohn (via ECF)